

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION

IN RE:) BANKRUPTCY CASE
))
KYONGSIK JUN,) NO.: 23-13312-MECR
MINSOO HA,))
) CHAPTER 13
Debtors.))
))
))

OBJECTION TO CONFIRMATION

COMES NOW The Bank Of New York Mellon Fka The Bank Of New York As Trustee
For The Certificateholders Of Cwmbs, Inc., Ch1 Mortgage Pass-Through Trust 2004-Hyb4,
Mortgage Pass-Through Certificates, Series 2004-Hyb4 (hereinafter known as "Creditor"), a
secured creditor holding a against the real property commonly known as 10282 Arizona Circle
#64, West Bethesda, MD 20817 (the "Property"), and for the reasons stated below, objects to
confirmation of Debtors' Chapter 13 plan (Doc. No. 7) (the "Plan").

1.

Debtor's Plan fails to provide for payment of any prepetition arrearage amount to
Creditor. Creditor has not yet filed a proof of claim but will do so prior to the expiration of the
claims deadline. According to preliminary figures, the arrearage is \$20,685.10. Confirmation of
the Plan should be denied until Debtor amends the Plan to properly treat Creditor's claim.

2.

Creditor reserves the right to raise the failure of Debtors to have made post-petition
mortgage payments if at the time of the confirmation hearing that appears to be the case.

WHEREFORE, Creditor prays that the Court will:

1. deny confirmation,
2. award reasonable attorney's fees, and
3. grant such other and further relief as is just and equitable.

/s/Elizabeth Parrott

Elizabeth Parrott
Maryland BAR NO. 22018
Attorney for Creditor
McCalla Raymer Leibert Pierce, LLC
1544 Old Alabama Road
Roswell, GA 30076
678-277-4911

Bankruptcy Case No.: 23-13312

Chapter: 13

CERTIFICATE OF SERVICE

I, Elizabeth Parrott, of MCCALLA RAYMER LEIBERT PIERCE, LLC, 1544 Old Alabama Road, Roswell, GA 30076, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I served a copy of the within OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Kyongsik Jun
10282 Arizona Circle, Apt. 64
Bethesda, MD 20817-1242

Minsoo Ha
10282 Arizona Circle, Apt. 64
Bethesda, MD 20817-1242

Christopher R. Wampler
12114B Heritage Park Circle
Silver Spring, MD 20906

(served via ECF Notification)

Timothy P. Branigan, Trustee
9891 Broken Land Parkway
Suite 301
Columbia, MD 21046

(served via ECF Notification)

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.

Executed on: 05/31/2023 By: */s/Elizabeth Parrott*
(date) Elizabeth Parrott
Maryland BAR NO. 22018
Attorney for Creditor